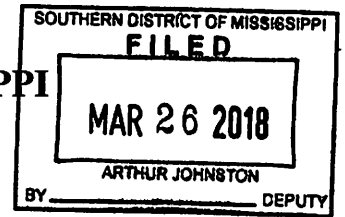


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT POINT
LODGE LTD OF NOVA SCOTIA & IN
THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, & ASHOKA

MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff Douglas Handshoe respectfully moves under Federal Rules of Civil
Procedure 56 for Summary Judgment with respect to Count 5 of the Third
Amended Complaint.

As discussed is more fully in the accompanying Memorandum of Law in
support thereof, Plaintiff will prove that the Slabbed New Media parody video,
published under the terms of Slabbed New Media's Creative Commons
noncommercial-attribution license to Plaintiff's YouTube account is a self-evident,
non-infringing fair use. Further, Plaintiff will prove that Defendant Leary did not
consider whether the YouTube video constituted a fair use of material to which he
owns a Canadian copyright, which he obtained after their initial publication to the
Slabbed New Media LLC website.

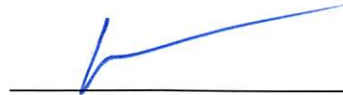
Additionally, Plaintiff will prove the Leary takedown notice at controversy was not sent in good faith by the defendant, but rather was as part of a long-standing scheme by Leary and his business partners to hide their involvement in a bribery and money laundering scheme masterminded by former Jefferson parish President Aaron Broussard.

Finally, the Plaintiff will show there are no material facts which are in dispute by the litigants with respect to Count 5 of the Third Amended Complaint.

Attached as Exhibit A to this Motion is the Declaration of Douglas Handshoe.

Plaintiff respectfully moves this Court to enter judgment on Count 5 of the Third Amended Complaint in favor of the Plaintiff and to award compensatory, nominal and punitive damages.

Respectfully submitted this 26th day of March,
2018,



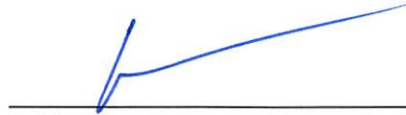
Plaintiff
Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on March 26, 2018 the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

I, Douglas Handshoe, hereby certify that on March 26, 2018, I mailed the foregoing to Charles Leary at 308 5th Ave E, Vancouver, BC V5T 1H4 Canada.

Respectfully submitted this 26th day of March, 2018,



Douglas Handshoe
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110 Hall Street
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(601) 928-5380
earning04@gmail.com